

**Bruce P. Beausejour**

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August 17, 2001

Kenneth W. Salinger  
Palmer & Dodge LLP  
One Beacon Street  
Boston, MA 02108-3190

**Re: D.T.E. 01-20 – Discovery Issues**

Dear Ken:

I am writing regarding the AT&T/WorldCom's joint responses to information requests propounded by Verizon MA in the above-referenced matter. Many of the information requests ask for "all documents, concerning, referencing, relating to or substantiating" a statement or assertion made by an AT&T/WorldCom witness. Some of the responses provide requested documents and other responses indicate that no such documents exist. However, several responses neither provide documents nor indicate that no documents exist.

In order to avoid the necessity for Verizon MA to file a motion to compel on the last category of responses, please supplement each of those responses to indicate clearly either (a) that no responsive document exists or (b) identify and provide copies of any responsive documents. The AT&T/WorldCom responses that need to be supplemented in this regard are the following: VZ-ATT/WC 1-10, 1-11, 1-12, 1-13, 1-15, 1-20, 1-24, 1-25, 1-28, 1-29, 1-41, 1-44, 1-45, 1-46, 1-48, 1-51, 1-56, 1-67, 1-70, 1-71, 1-88, 1-89, 1-95 and 2-9.

In addition, the information requests VZ-ATT-WC 1-10, 1-17 and 1-18 also ask for supporting documentation, and the responses indicate that supporting documentation has already been provided. However, there is no citation to the documents that have been provided. Please supplement those responses to identify the documents that have been provided and to indicate that there are no additional documents responsive to the requests.

Kenneth W. Salinger, Esq.

August 21, 2001

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Thank you for your cooperation in this matter. If you have any questions, please don't hesitate to call.

Sincerely,

Bruce P. Beausejour

cc: Service List